Agenda for July 9 Conference Call with EPA/ADEQ re:
Conceptual Site Model for PCDD/Fs at the Arkwood Inc. Site

Objective of Conceptual Site Model (CSM):

- In late 2012, USEPA requested evaluation of existing Site data to determine compliance with new risk assessment guidelines for PCDD/Fs.
- After initial data review, ChemRisk performed Site inspection and collected samples in support of a screening level risk assessment.
- A Screening Risk Assessment (SRA) was prepared.
- Comments by USEPA on the SRA included a request for preparation of a Conceptual Site Model (CSM) to allow the reader of the SRA to better understand the potential PCDD/F sources, exposure pathways and receptors.
- The objective of the CSM is to depict the potential PCDD/F sources, exposure pathways and receptors post remediation.
- A comprehensive "Baseline CSM" assessing all chemicals and pathways, is not the objective, since: 1) the focus of EPA's inquiry is on PCDD/F regulatory compliance; and 2) the Site has been the subject of prior extensive investigation and remedial activities under USEPA oversight.
- The groundwater pathway concerns a pentachlorophenol (PCP) release from the karst formation beneath the site, not PCDD/Fs, so a groundwater pathway will not be included.

Impact of Prior Site Investigation and Remedy on Site CSM for PCDD/Fs

- PCDD/F contamination on-site was investigated and subsequently remediated in 1994-1995 under EPA oversight.
- EPA selected remedy of limited excavation, offsite disposal of impacted materials and placement of a 6-inch clean soil onsite cap-cutting off exposure to any underlying, residual PCDD/F soil concentrations, which confirmation sampling demonstrated was below the applicable PCDD/F cleanup standard set forth in the ROD.
- The Site cap is still in place, with full vegetated cover.
- Assuming uncontaminated cap, the current site configuration precludes any appreciable airborne dust exposure pathway and therefore limits future PCDD/F exposures to dermal contact and incidental ingestion for onsite ditch soils applicable to maintenance workers and trespassers, which will be focus of McKesson's SCM.
- The selected EPA remedy included institutional controls:
    - Pursuant to deed restriction requirements in ROD, future use of the site is limited to industrial uses not disturbing the vegetated cap.
    - Fencing is installed around the onsite soil cap; due to the detection of soil PCDD/Fs at 1.6 ppb TEQ at the natural berm near the current fence line, McKesson proposes to relocate the fence line to the base of the adjacent hillside, cutting off potential exposure pathway to Site trespassers.

McKesson's CSM for PCDD/Fs will include:

- A graphic illustration of the former site configuration before remediation.

- A graphic illustration of the excavated and capped areas and color-coded PCDD/F concentrations from available/relevant 1995 and 2013 soil sampling.
- Tabulated information on all available soil PCDD/F measurements.
- A graphic illustration of the current topography of the Site, including storm water ditches and natural barriers to offsite water and sediment releases from the Site.
- Photographs illustrating the current condition of the vegetated soil cap.
- A graphic illustration of the Site showing proposed "decision units" and "sampling units" based on past site uses, remedial activities, and 2013 onsite soil data based on USEPA (2011) UFP-QAPP guidance.
- A letter report providing a narrative description of the CSM documentation.